



Advocates for Workplace Fairness

September 26, 2023

Via ECF:

The Honorable Nelson S. Roman
United States District Judge
Southern District of New York
300 Quarrapas St.
White Plains, New York 10601-4150

Re: *Dail Moses-Taylor v. Greyston Foundation, Inc.*, Case No. 1:21-cv-06756

Dear Judge Roman:

We represent the Plaintiff Dail Moses-Taylor in the above-referenced matter. We write with Defendant's consent to seek an extension of the current briefing schedule for Plaintiff's enforcement motion. *See* ECF No. 68. This is Plaintiff's first request for an extension. Earlier today, Defendant's counsel represented that the Settlement Payment at issue will be in transit to Plaintiff's counsel's office no later than this Friday, September 30, 2023. To allow time for the potential resolution of the primary issue pending before the Court, Plaintiff respectfully proposes the following extended briefing schedule:

October 13: Plaintiff to serve her enforcement motion

November 13: Defendant to serve its opposition

December 4: Plaintiff to serve her reply and file the fully-briefed motion on ECF

We thank the Court for its consideration of this matter.

Respectfully submitted,

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Counsel for the Plaintiff

cc: All Parties (via ECF)